

STATE OF MISSISSIPPI
IN THE CIRCUIT COURT OF HANCOCK COUNTY



I, Karen Ladner Ruhr, Clerk of the Circuit Court of Hancock County, Mississippi do certify that the following constitutes a true and correct copy and literal transcript of the *Complete file being Vaughn Peret et al vs Douglas Handshel, Case #14-0194.* as the same now appears on file in my office of record.

AND I FURTHER CERTIFY that said Circuit Court is a Court of record with an official seal, and that I, as clerk of said Circuit Court, am the custodian of the records and of the seal of said Court.

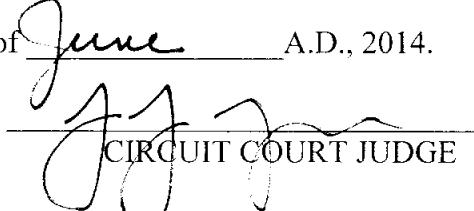
IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of this said Court, at the City of Bay St. Louis, on this the 16th day of June in the year of our Lord, two thousand and fourteen.

KAREN LADNER RUHR
CLERK OF THE CIRCUIT COURT
HANCOCK COUNTY, MISSISSIPPI

STATE OF MISSISSIPPI

I, John C. Gargiulo, a Judge of the Second Circuit Court District of the State of Mississippi, said district including the County of Hancock, do hereby certify that Karen Ladner Ruhr's genuine signature appears to the annexed and foregoing attestation, is now, and was at the date hereof, the Clerk of the Circuit Court of Hancock County, in said State duly elected and qualified, and that her said attestation is in due form.

Witness my signature, this the 16th day of June A.D., 2014.


CIRCUIT COURT JUDGE

STATE OF MISSISSIPPI
COUNTY OF HANCOCK

I, the undersigned Clerk of the Circuit Court of the County of Hancock, in said State (said court being a court of record and having a seal), do hereby certify that John C. Gargiulo whose genuine signature appears to the annexed and foregoing attestation, is now, and was at the date thereof a Judge of the Second Circuit Court District of said State which said District includes the said County of Hancock and that said John C. Gargiulo, as aforesaid, is now, and was at the date of said attestation duly commissioned and qualified.

GIVEN UNDER my hand and seal of office, at Bay St. Louis, Mississippi, this the 16th day of June A.D., 2014.


KAREN LADNER RUHR
CIRCUIT CLERK

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

VAUGHN PERRET

CHARLES LEARY

TROUT POINT LODGE LIMITED

FILED

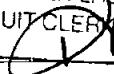
PLAINTIFFS

VS.

JUN 02 2014

CIVIL ACTION NO.: 14-0197

DOUGLAS HANDSHOE

KAREN LADNER RUHR
CIRCUIT CLERK, HANCOCK CO
BY 
DE

DEFENDANT

PETITION TO ENROLL FOREIGN JUDGMENT

COME NOW the Plaintiffs and file this their *Petition to Enroll Foreign Judgment* by and through the undersigned counsel and in support thereof would show unto the Court the following, to-wit:

1.

Vaughn Perret and Charles Leary are actual adult bona fide residents of Nova Scotia and are the principles in Trout Point Lodge Limited, a Nova Scotia company existing by virtue of the laws of Nova Scotia.

Douglas Handshoe is an actual adult bona fide resident citizen of Hancock County and may be served with process of this Court at 214 Corinth Drive, Bay St. Louis, MS 39520 or wherever he may be found.

2.

That on or about February 26, 2014, the Supreme Court of Nova Scotia entered an Order finding that the Defendant, Douglas Handshoe was found liable for copyright infringement under the Canada Copyright Act to the Plaintiffs as follows:

THAT the Defendant Douglas K. Handshoe pay the sum of twenty thousand Canadian dollars (\$20,000) in statutory damages to Charles Leary;

THAT the Defendant Douglas K. Handshoe pay the sum of forty thousand Canadian dollars (\$40,000) in statutory damages to Trout Point Lodge, Ltd.;

THAT the Defendant Douglas K. Handshoe pay the sum of twenty thousand Canadian dollars (\$20,000) in statutory damages to Vaughn Perret;

THAT the Defendant Douglas K. Handshoe pay all of the Plaintiffs the sum of one hundred thousand Canadian dollars (\$100,000) in punitive damages.

A copy of same is attached hereto and made a part hereof as if fully copied in words and figures.

3.

Mr. Handshoe was personally served and was present for this hearing and is and was aware of his financial responsibility yet he has chosen not to satisfy the judgement nor make any attempt to satisfy this judgment.

4.

This Judgment rendered by the Nova Scotia Supreme Court is protected by and should be enforced under the comity between the United States of America and Canada along with various treaties and agreements such as the Berne Convention for the Protection of Literary and Artistic Works and NAFTA.

5.

Our Supreme Court has held and opined that holding foreign decrees enforceable unless contrary to Mississippi public policy . *Laskosky v. Laskosky*, 450 So. 726 (Miss. 1987). The Judgment is being entered under the Articles of Congress which is attached hereto and made a part hereof as if fully copied in words in figures. The Articles of Congress give credence to the validity of the Judgment and its enforceability under Full Faith and Credit.

6.

This Court should immediately enroll this Judgment on the Judgment Books of Hancock

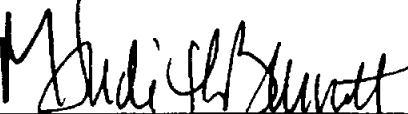
County, Mississippi where the Defendant holds property. This Court should also set a time certain for the Plaintiffs to conduct a Mississippi Rule of Civil Procedure 69 post judgment creditor examination in the Courthouse at a time when the Circuit Court Judge is available to intervene should problems arise.

WHEREFORE, PREMISES CONSIDERED this Honorable Court should receive and file the *Petition to Enroll Foreign Judgment* and to let process issue upon the Defendant giving him twenty (20) days within which to respond and upon a hearing on the merits enroll the foreign judgment and set a date for the MRCP 69.

RESPECTFULLY SUBMITTED, this the 21 day of May, 2014.

VAUGHN PERRET
CHARLES LEARY
TROUT PONT LODGE LIMITED

BY:


M. JUDITH BARNETT, THEIR ATTORNEY

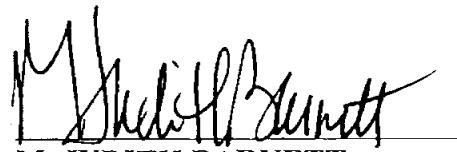
M. JUDITH BARNETT (MSB #99766)
M. JUDITH BARNETT, P.A.
1911 Dunbarton Drive
Jackson, MS 39216
Telephone: (601) 981-4450
Facsimile: (601) 981-4717
mjbarrett@ yahoo.com

CERTIFICATE OF SERVICE

THIS is to certify that I, M. Judith Barnett, have this date served, via United States mail, postage prepaid, a true and correct copy of the above and foregoing document to:

Douglas Handshoe
214 Corinth Drive
Bay St. Louis, MS 39520

THIS the 20 day of May, 2014.



M. JUDITH BARNETT

SUPREME COURT OF NOVA SCOTIA
CERTIFICATE

I, Gael O'Keefe, Prothonotary (chief court clerk) of the Supreme Court of Nova Scotia, Canada, do certify that the following constitutes a true and correct copy and a literal transcript of the Order regarding damages for copyright infringement of Supreme Court Justice Kevin Coady in the matter of **Trout Point Lodge, Limited, Charles Leary, and Vaughn Perret versus Douglas K. Handshoe, No. 411345**, dated February 26, 2014, and initialled by Justice Coady, as the same now appears on file in my office of record.

AND I FURTHER CERTIFY that said Supreme Court of Nova Scotia is a court of record with an official seal, and that I as Prothonotary of Said Supreme Court of Nova Scotia, am the custodian of records and of the seal of Said Court.

IN TESTIMONY WHEREOF, I have hereto set my hand and affixed the seal of this said Court, at the city of Halifax, Nova Scotia, on this 7th day of March in the year of our lord two-thousand and fourteen.

Gael O'Keefe (sign)

Gael O'Keefe (print)

PROTHONOTARY OF THE
SUPREME COURT OF NOVA SCOTIA

PROVINCE OF NOVA SCOTIA

I, KEVIN COADY, a Justice of the Supreme Court of Nova Scotia, do hereby certify that

Gael O'Keefe (Prothonotary) who's true signature appears to the forgoing Certificate is now and was at the date of said Certificate, the Prothonotary (chief court clerk) of the Supreme Court of Nova Scotia, duly qualified according to law and that her said Certificate is in due form of law; that the seal hereto attached is the genuine seal of said Supreme Court of Nova Scotia, and that Said Court is a Court of Record.

Witness my signature, this 10 day of MARCH A.D. 2014

JUSTICE

SUPREME COURT OF NOVA SCOTIA

I, Caroline McInnes, Prothonotary of the Supreme Court of Nova Scotia, do hereby certify that Justice Kevin Coady, who's signature appears to the annexed and foregoing attestation, is now and was at the date of said Certificate, a Justice of the Supreme Court of Nova Scotia, duly appointed by lawful authority and legally qualified, and that the Certificate and Attestation are in due form of law, and that the Supreme Court of Nova Scotia is the highest court in the Province of Nova Scotia and a Court of Record.

Caroline McInnes (sign)

Caroline McInnes (print)
PROTHONOTARY OF THE
SUPREME COURT OF NOVA SCOTIA



SUPREME COURT OF NOVA SCOTIA

BETWEEN:

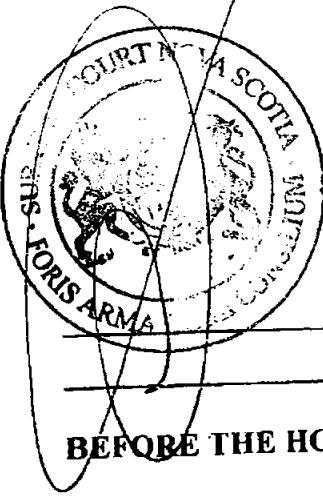
Trout Point Lodge Ltd., Charles Leary & Vaughn Perret

Plaintiff

- and -

Douglas K. Handshoe

Defendant

S.G.D.
K.C.
J.

ORDER

BEFORE THE HONOURABLE JUSTICE KEVIN COADY:

WHEREAS the Court is satisfied that the Defendant Douglas K. Handshoe was personally served with notice of this action;

AND WHEREAS the Defendant Douglas K. Handshoe filed a Demand for Notice and did not file a Defence to this action;

AND WHEREAS the Court is satisfied that the Defendant Douglas K. Handshoe received notice of this assessment of damages;

AND AFTER HAVING REVIEWED the Plaintiff's evidence, exhibits and submissions and being satisfied that the Defendant Douglas K. Handshoe infringed all three plaintiffs copyright in photographic images throughout 2012 and 2013.

IT IS ORDERED:

1. THAT the Defendant Douglas K. Handshoe pay the sum of twenty thousand Canadian dollars (\$20,000) in statutory damages to Charles Leary;
2. THAT the Defendant Douglas K. Handshoe pay the sum of forty thousand Canadian dollars (\$40,000) in statutory damages to Trout Point Lodge Ltd.;
3. THAT the Defendant Douglas K. Handshoe pay the sum of twenty thousand Canadian dollars (\$20,000) in statutory damages to Vaughn Perret;
4. THAT the Defendant Douglas K. Handshoe pay all the Plaintiffs the sum of one hundred thousand Canadian dollars (\$100,000) in punitive damages.

DATED at Halifax, Nova Scotia, this 26th day of February, 2014.

Prothonotary

Certified to be a true and correct copy
of original document herein

Date March 1, 2014

Gael O'KEEFE
Deputy Prothonotary

COVER SHEET Civil Case Filing Form <i>(To be completed by Attorney/Party Prior to Filing of Pleading)</i>		Court Identification Docket # 23 1 ccl County # Judicial Court ID District (CH, CI, CO) 060214 Month Date Year	Case Year 2014	Docket Number 00197 Local Docket ID
Mississippi Supreme Court Administrative Office of Courts		Form AOC/01 (Rev 2009)	This area to be completed by clerk	
				Case Number if filed prior to 1/1/94
In the CIRCUIT		Court of HANCOCK	County —	Judicial District
Origin of Suit (Place an "X" in one box only) <input checked="" type="checkbox"/> Initial Filing <input type="checkbox"/> Reinstituted <input type="checkbox"/> Remanded <input type="checkbox"/> Reopened <input type="checkbox"/> Foreign Judgment Enrolled <input type="checkbox"/> Joining Suit/Action <input type="checkbox"/> Transfer from Other court <input type="checkbox"/> Appeal <input type="checkbox"/> Other				
Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form				
Individual Perret		Last Name Vaughn	First Name	Maiden Name, if applicable
				M.I. _____ Jr/Sr/III/IV _____
		Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____		
		Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity D/B/A or Agency _____		
Business		Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated		
		Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: D/B/A _____		
Address of Plaintiff _____				
Attorney (Name & Address) M. Judith Bennett, M. Judith Bennett, PA, 1911 Dunbarton Dr. Jackson, 39216		MS Bar No. 99766		
		Check (x) if Individual Filing Initial Pleading is NOT Law Firm _____		
Signature of Individual Filing: M. Judith Bennett				
Defendant - Name of Defendant - Enter Additional Defendants on Separate Form				
Individual Handshoe		Last Name Douglas	First Name	Maiden Name, if applicable
				M.I. _____ Jr/Sr/III/IV _____
		Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____		
		Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity D/B/A or Agency _____		
Business		Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated		
		Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below: D/B/A _____		
Attorney (Name & Address) - If Known _____		MS Bar No. _____		
Damages Sought: Compensatory \$ _____ Punitive \$ _____		Check (x) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet		
Nature of Suit (Place an "X" in one box only)				
Domestic Relations		Business/Commercial	Children/Minors - Non-Domestic	Real Property
<input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Diff. <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA) <input type="checkbox"/> Other _____		<input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input checked="" type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____	<input type="checkbox"/> Adoption - Contested <input type="checkbox"/> Adoption - Uncontested <input type="checkbox"/> Consent to Abortion Minor <input type="checkbox"/> Removal of Minority <input type="checkbox"/> Other _____	<input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale: Confirm/Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____
Appeals		Probate	Civil Rights	Torts
<input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Dept Employment Security <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other _____		<input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Other _____	<input type="checkbox"/> Elections <input type="checkbox"/> Expungement <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief/Prisoner <input type="checkbox"/> Other _____	<input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____
		Contract	Statutes/Rules	
		<input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____	<input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____	

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF

Docket No. _____ - _____ Docket No. If Filed
File Yr _____ Chronological No. _____ Clerk's Local ID _____ Prior to 1/1/94 _____

PLAINTIFFS IN REFERENCED CAUSE - Page 1 of _____ Plaintiffs Pages
IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Plaintiff #2:

Individual: Leary Last Name Charles First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

Check () if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

Check () if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
D/B/A _____

Business _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check () if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: 99766 Bar # or Name: _____ Pro Hac Vice () Not an Attorney() _____

Plaintiff #3:

Individual: _____ Last Name _____ First Name (_____ Maiden Name, if Applicable _____) Middle Init. Jr/Sr/III/IV

Check () if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

Check () if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
D/B/A _____

Business Troutpoint Lodge Limited Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check () if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: 99766 Bar # or Name: _____ Pro Hac Vice () Not an Attorney() _____

Plaintiff #4:

Individual: _____ Last Name _____ First Name (_____ Maiden Name, if Applicable _____) Middle Init. Jr/Sr/III/IV

Check () if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

Check () if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
D/B/A _____

Business _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check () if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: _____ Bar # or Name: _____ Pro Hac Vice () Not an Attorney() _____

M. JUDITH BARNETT, P.A.
Attorneys at Law
1911 Dunbarton Drive
Jackson, Mississippi 39216
Telephone: 601.981.4450 • Facsimile: 601.981.4717

M. Judith Barnett
Jeanine M. Carafello
Catherine Lee

mjbarnettppa@yahoo.com
jcarafello@comcast.net
catherinelee@judybarnettppa.com

May 28, 2014

Honorable Karen Ladner Ruhr
Hancock County Circuit Clerk
152 Main Street, Suite B
Bay St. Louis, Mississippi 39520

14-0197

Re: *Vaughn Perret, et al. vs. Douglas Handhoe*
In the Circuit Court of Hancock County, Mississippi

Dear Ms. Ruhr:

Enclosed for filing please find the original and two (2) copies of the following document in the above-referenced matter:

1. *Petition to Enroll Foreign Judgment*

If you would, please file the original document in your usual manner and return the stamped "filed" copies to my office in the franked envelope provided.

Thank you for your assistance in this matter.

Sincerely yours,

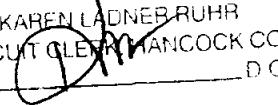
M. JUDITH BARNETT, P.A.

M. Judith Barnett

MJB/mmk
enclosures
cc: file

FILED

JUN 02 2014

KAREN LADNER RUHR
CIRCUIT CLERK HANCOCK CO
BY  D.C.

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

Vaughn Perret
Charles Leary
Trout Point Lodge Limited
VERSUS

CAUSE NO. 14-0197

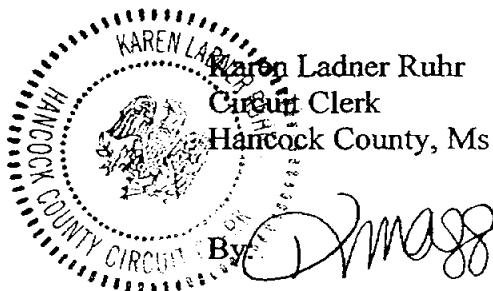
Douglas Handshore

CLERK'S NOTICE OF FILING OF FOREIGN JUDGMENT

COMES NOW Judgment Creditor, Vaughn Perret, Charles Leary &
Trout Point Lodge Limited
files this its' Notice of filing Foreign Judgment as follows:

1. The name and address of the Judgment Creditor is Vaughn Perret, Charles Leary & Trout Point Lodge Limited
2. The name and address of the Judgment Creditor's Attorney in the State of Mississippi is M. Judith Barnett - 1911 Dunbarton Dr.
Oxford, MS. 39216
3. A true and accurate copy of the Judgment in favor of Vaughn Perret, Charles Leary & Trout Point Lodge Limited
is attached; and
4. The name and address of the Judgment Debtor is: Douglas Handshore
214 Corinth Dr. Bay St. Louis, MS. 39520

This the 2nd day of June 2014.



FEE BILL, CIVIL CASES, CIRCUIT COURT

State of Mississippi
 Hancock County

PERRET, VAUGHN & CHARLES LEARY ET AL VS HANDSHOE, DOUGLAS

Case # 14-0197	Acct #	Paid By CHECK 4932	Rct# 27692
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CLERK'S FEES	85.00
JURY TAX	3.00
COURT REPORTERS FEE	10.00
LAW LIBRARY	2.50
COURT ADMINISTRATOR	2.00
STATE CT ED FUND	2.00
COURT CONSTITUENTS	.50
ELECTRONIC COURT	10.00
LEGAL ASSISTANCE	5.00
JUDICIAL FUND-JUDGE RAISE	40.00
ARCHIVE FEE	1.00

=====

Total \$ 161.00

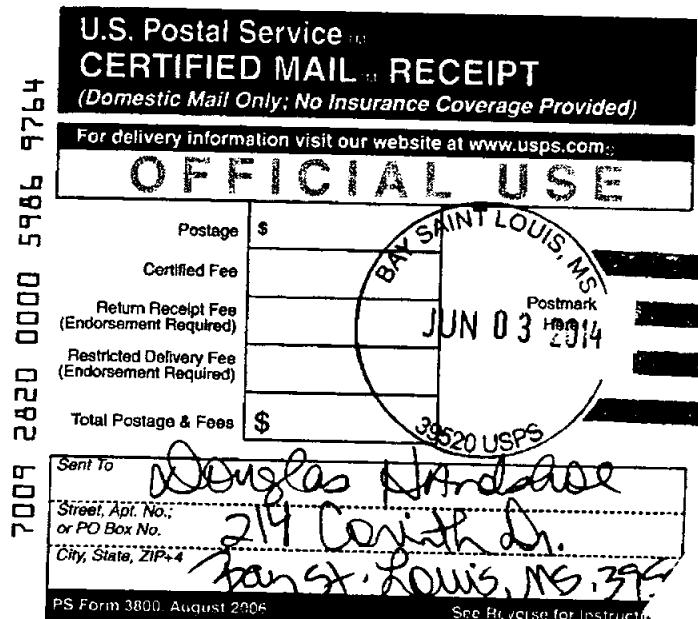
Payment received from M. JUDITH BARNETT, P.A.

Transaction 29432 Received 6/ 2/2014 at 15:53 Drawer 1 I.D. KENDRA

Current Balance Due	\$0.00	Receipt Amount \$ 161.00
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By D.C. Karen Ladner Ruhr, Circuit Clerk

Case # 14-0197	Acct #	Paid By CHECK 4932	Rct# 27692
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FILED

JUN 04 2014

KAREN LADNER RUHR
CIRCUIT CLERK, HAMCOCK CO
BY *[Signature]* D.C.

SENDER: COMPLETE THIS SECTION		14-0197 COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input checked="" type="checkbox"/> </p> <p>B. Received by (Printed Name) <input type="checkbox"/> Agent C. Date of Delivery <input type="checkbox"/> Addressee <i>6/17/14</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>1. Article Addressed to:</p> <p><i>Douglas H. Andelose 214 Corinth Dr. Bay St. Louis, MS. 39520</i></p>		<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Transfer from service label)</p> <p><i>7009 2820 0000 5986 9764</i></p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

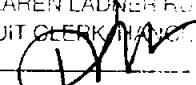
PS Form 3811, February 2004

Domestic Return Receipt

102595-02-A-1540

FILED

JUN 06 2014

KAREN LADNER RUMMEL
CIRCUIT CLERK HANCOCK CO
BY 

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

VAUGHN PERRET)	
CHARLES LEARY)	PLAINTIFFS
TROUT POINT LODGE, LTD, A Nova)	
Limited Company)	
v.)	Civil Action No. <u>14-0197</u>
DOUGLAS HANDSHOE)	DEFENDANT

NOTICE OF FILING OF REMOVAL

Defendant hereby gives notice that he has filed a Notice of Removal in the United States District Court for the Southern District of Mississippi in the case styled Vaughn Perret, Charles Leary and Trout Point Lodge Limited, Civil Action No. 14-0197. A copy of the Notice of removal is attached as Exhibit "1".

Respectfully submitted this 11th day of June, 2014,



Defendant
Douglas Handshoe
214 Corinth Drive
Bay St Louis, MS 39520
(601) 928-5380
earning04@gmail.com

FILED
JUN 11 2014
KAREN LACNER RUHR
CIRCUIT CLERK, HANCOCK CO
BY  D.C.

CERTIFICATE OF SERVICE

I, Douglas Handhoe, certify I have sent a true and correct copy of the foregoing Notice of Filing of Notice of Removal to the following via United States Mail:

M. Judith Barnett, Esq.
1911 Dunbarton Drive
Jackson, MS 39216
Telephone: (601) 981-4450
Facsimile: (601) 981-4717
mjbarnettpa@yahoo.com
Attorney for Plaintiffs

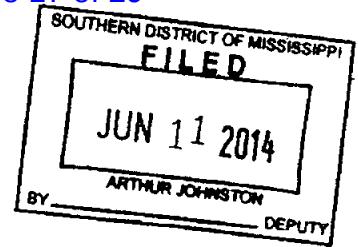
Respectfully submitted this 11th day of June, 2014,



Defendant
Douglas Handhoe
214 Corinth Drive
Bay St Louis, MS 39520
(601) 928-5380
earning04@gmail.com

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



VAUGHN PERRET)	
CHARLES LEARY)	PLAINTIFFS
TROUT POINT LODGE, LTD, A Nova)	
Limited Company)	
v.)	Civil Action No. <u>1:14cv241LG-JML</u>
DOUGLAS HANDSHOE)	DEFENDANT
)	

DEFENDANT'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1441 *et seq.*, Defendant, Douglas Handshoe, files this Notice of Removal of the Civil Action filed against him by Plaintiffs, Vaughn Perret, Charles Leary and Trout Point Lodge, Ltd, and states as follows.

1. On June 2, 2014, Plaintiffs' filed their Petition to Enroll Foreign Judgment in the lawsuit styled Vaughn Perret, Charles Leary and Trout Point Lodge Ltd, Civil Action No. 14-0197, in the Circuit Court of Hancock County, Mississippi.
2. The Defendant, Douglas Handshoe, was served with notice of such filing on June 5, 2014.
3. Removal is proper under 28 U.S.C. § 4103 because Plaintiffs' suit involves a Federal question. Specifically, Plaintiffs have alleged defamation via Internet by Defendant in securing rendition of foreign judgments¹ against Defendant in the Supreme

¹ Plaintiffs, with the assistance of Nova Scotia Supreme Court and over the objection of defendant Handshoe, essentially bifurcated an amended Civil Action post judgment between the defamation torts Plaintiffs' had previously successfully argued in Nova Scotia were integral to the copyright torts alleged in their amended action. Plaintiffs now attempt to enroll only a portion of the whole in an attempt to defeat the requirements of 28 U.S.C. §§ 4101 et seq.

Court of Nova Scotia, Canada on or about February 26, 2014 in the civil action styled Trout Point Lodge Ltd., Charles Leary & Vaughn Perret v Douglas Handshoe.²

4. Venue is proper in this district under 28 U.S.C. § 1441 (a) because the State Court where the action has been pending is located in this district.

5. This Notice is being filed with this Court within Thirty (30) days after Defendant received a copy of the Plaintiffs' initial pleading, Petition to Enroll Foreign Judgment.

6. Defendant would further show that true and correct copies of all process, pleadings and orders filed to date in the above State Court action served upon Defendant are attached hereto as Exhibit "A"; and that no other process, pleadings or orders have been served upon Defendant to date in this action.

7. Defendant files this Notice with waiving any defenses to the claims asserted by Plaintiff or conceding that Plaintiffs' above described foreign judgment can be enrolled or enforced.

8. Defendant is filing contemporaneously with this Notice, a Notice of Filing Notice of Removal with the Clerk of the Circuit Court of Hancock County, Mississippi, informing the Honorable Clerk that this action is being removed. A copy of said Notice of Filing Notice of removal is attached as Exhibit "B".

² The is the second attempt by instant Plaintiffs to enroll a foreign defamation award against defendant Handshoe for exposing their roles in a bribery and money laundering scheme involving self-admitted felon Aaron Broussard, Parish of Jefferson third party contractors and the Resort at Trout Point Lodge, Nova Scotia, on whose behalf Plaintiffs acted as financial intermediary conducting sham financial transactions with a Louisiana registered LLC, Nova Scotia Enterprises, LLC which owed nothing of value in the Province of Nova Scotia. Nova Scotia Enterprises LLC was owned by Broussard and his ex-wife Karen Parker. It was identified by Federal prosecutors as a Broussard bribery scheme, among other illegal acts alleged against Broussard by United States prosecutors.

Defendant prays that this Court take jurisdiction of this action to its conclusion, to the exclusion of any further proceedings in the State Court in accordance with the law. Defendant also prays for such other and further relief to which he may be justly entitled.

Respectfully submitted this 11th day of June, 2014,



Defendant
Douglas Handshoe
214 Corinth Drive
Bay St Louis, MS 39520
(601) 928-5380
earning04@gmail.com

CERTIFICATE OF SERVICE

I, Douglas Handshoe, certify I have sent a true and correct copy of the foregoing Notice of Removal to the following via United States Mail:

M. Judith Barnett, Esq.
1911 Dunbarton Drive
Jackson, MS 39216
Telephone: (601) 981-4450
Facsimile: (601) 981-4717
mjbarnettpa@yahoo.com
Attorney for Plaintiffs

I, Douglas Handshoe, certify I have hand delivered a true and correct copy unto:

Honorable Karen Ladner Ruhr
Circuit Clerk of Hancock County, Mississippi
152 Main Street, Suite B
Bay St Louis, MS 39520

Respectfully submitted this 11th day of June, 2014,



Defendant
Douglas Handshoe
214 Corinth Drive
Bay St Louis, MS 39520
(601) 928-5380
earning04@gmail.com

Exhibit A"

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

Vaughn Penet
Charles Lary
Trent Point Lodge Limited
VERSUS
Douglas Handhole

CAUSE NO. 14-0197

CLERK'S NOTICE OF FILING OF FOREIGN JUDGMENT

COMES NOW Judgment Creditor, Vaughn Penet, Charles Lary, and
Trent Point Lodge Limited
files this its' Notice of filing Foreign Judgment as follows:

1. The name and address of the Judgment Creditor is Vaughn Penet, Charles Lary & Trent Point Lodge Limited
2. The name and address of the Judgment Creditor's Attorney in the State of Mississippi is M. Judith Barnett - 1911 Dunbarton Dr.
Jackson, MS. 39216
3. A true and accurate copy of the Judgment in favor of Vaughn Penet, Charles Lary & Trent Point Lodge Limited
is attached; and
4. The name and address of the Judgment Debtor is: Douglas Handhole
214 Corinth Dr. Bay St. Louis, MS. 39520

This the 2nd day of June 2014.

Karen Ladner Ruhr
Circuit Clerk
Hancock County, Ms

By: D. Massie D.C.

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

VAUGHN PERRET
CHARLES LEARY
TROUT POINT LODGE LIMITED

PLAINTIFFS

VS.

JUN 02 2014 CIVIL ACTION NO.: 14-0197

DOUGLAS HANDSHOE

DEFENDANT

PETITION TO ENROLL FOREIGN JUDGMENT

COME NOW the Plaintiffs and file this their *Petition to Enroll Foreign Judgment* by and through the undersigned counsel and in support thereto would show unto the Court the following, to-wit:

1.

Vaughn Perret and Charles Leary are actual adult bona fide residents of Nova Scotia and are the principles in Trout Point Lodge Limited, a Nova Scotia company existing by virtue of the laws of Nova Scotia.

Douglas Handshoe is an actual adult bona fide resident citizen of Hancock County and may be served with process of this Court at 214 Corinth Drive, Bay St. Louis, MS 39520 or wherever he may be found.

2.

That on or about February 26, 2014, the Supreme Court of Nova Scotia entered an Order finding that the Defendant, Douglas Handshoe was found liable for copyright infringement under the Canada Copyright Act to the Plaintiffs as follows:

THAT the Defendant Douglas K. Handshoe pay the sum of twenty thousand Canadian dollars (\$20,000) in statutory damages to Charles Leary;

THAT the Defendant Douglas K. Handshoe pay the sum of forty thousand Canadian dollars (\$40,000) in statutory damages to Trout Point Lodge, Ltd.;

THAT the Defendant Douglas K. Handshoe pay the sum of twenty thousand Canadian dollars (\$20,000) in statutory damages to Vaughn Perret;

THAT the Defendant Douglas K. Handshoe pay all of the Plaintiffs the sum of one hundred thousand Canadian dollars (\$100,000) in punitive damages.

A copy of same is attached hereto and made a part hereof as if fully copied in words and figures.

3.

Mr. Handshoe was personally served and was present for this hearing and is and was aware of his financial responsibility yet he has chosen not to satisfy the judgement nor make any attempt to satisfy this judgment.

4.

This Judgment rendered by the Nova Scotia Supreme Court is protected by and should be enforced under the comity between the United States of America and Canada along with various treaties and agreements such as the Berne Convention for the Protection of Literary and Artistic Works and NAFTA.

5.

Our Supreme Court has held and opined that holding foreign decrees enforceable unless contrary to Mississippi public policy . *Laskosky v. Laskosky*, 450 So. 726 (Miss. 1987). The Judgment is being entered under the Articles of Congress which is attached hereto and made a part hereof as if fully copied in words in figures. The Articles of Congress give credence to the validity of the Judgment and its enforceability under Full Faith and Credit.

6.

This Court should immediately enroll this Judgment on the Judgment Books of Hancock

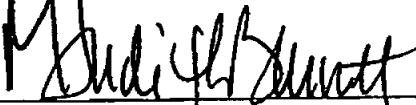
County, Mississippi where the Defendant holds property. This Court should also set a time certain for the Plaintiffs to conduct a Mississippi Rule of Civil Procedure 69 post judgment creditor examination in the Courthouse at a time when the Circuit Court Judge is available to intervene should problems arise.

WHEREFORE, PREMISES CONSIDERED this Honorable Court should receive and file the *Petition to Enroll Foreign Judgment* and to let process issue upon the Defendant giving him twenty (20) days within which to respond and upon a hearing on the merits enroll the foreign judgment and set a date for the MRCP 69.

RESPECTFULLY SUBMITTED, this the 21 day of May, 2014.

VAUGHN PERRET
CHARLES LEARY
TROUT PONT LODGE LIMITED

BY:


M. JUDITH BARNETT, THEIR ATTORNEY

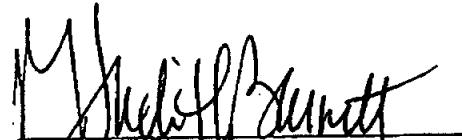
M. JUDITH BARNETT (MSB #99766)
M. JUDITH BARNETT, P.A.
1911 Dunbarton Drive
Jackson, MS 39216
Telephone: (601) 981-4450
Facsimile: (601) 981-4717
mjbarrett@ yahoo.com

CERTIFICATE OF SERVICE

THIS is to certify that I, M. Judith Barnett, have this date served, via United States mail, postage prepaid, a true and correct copy of the above and foregoing document to:

Douglas Handhoe
214 Corinth Drive
Bay St. Louis, MS 39520

THIS the 21 day of May, 2014.



M. JUDITH BARNETT

SUPREME COURT OF NOVA SCOTIA
CERTIFICATE

I, Gael O'Keeffe, Prothonotary (chief court clerk) of the Supreme Court of Nova Scotia, Canada, do certify that the following constitutes a true and correct copy and a literal transcript of the Order regarding damages for copyright infringement of Supreme Court Justice Kevin Coady in the matter of Trout Point Lodge, Limited, Charles Leary, and Vaughn Perret versus Douglas K. Handshoe, No. 411345, dated February 26, 2014, and initialled by Justice Coady, as the same now appears on file in my office of record.

AND I FURTHER CERTIFY that said Supreme Court of Nova Scotia is a court of record with an official seal, and that I as Prothonotary of Said Supreme Court of Nova Scotia, am the custodian of records and of the seal of Said Court.

IN TESTIMONY WHEREOF, I have hereto set my hand and affixed the seal of this said Court, at the city of Halifax, Nova Scotia, on this 7th day of March in the year of our lord two-thousand and fourteen.

Gael O'Keeffe (sign)

Gael O'Keeffe (print)

PROTHONOTARY OF THE
SUPREME COURT OF NOVA SCOTIA

PROVINCE OF NOVA SCOTIA

I, KEVIN COADY, a Justice of the Supreme Court of Nova Scotia, do hereby certify that

Gael O'Keeffe (Prothonotary) who's true signature appears to the forgoing Certificate is now and was at the date of said Certificate, the Prothonotary (chief court clerk) of the Supreme Court of Nova Scotia, duly qualified according to law and that her said Certificate is in due form of law; that the seal hereto attached is the genuine seal of said Supreme Court of Nova Scotia, and that Said Court is a Court of Record.

Witness my signature, this 10 day of MARCH A.D. 2014

JUSTICE

SUPREME COURT OF NOVA SCOTIA

I, Caroline McInnes, Prothonotary of the Supreme Court of Nova Scotia, do hereby certify that Justice Kevin Coady, who's signature appears to the annexed and foregoing attestation, is now and was at the date of said Certificate, a Justice of the Supreme Court of Nova Scotia, duly appointed by lawful authority and legally qualified, and that the Certificate and Attestation are in due form of law, and that the Supreme Court of Nova Scotia is the highest court in the Province of Nova Scotia and a Court of Record.

Caroline McInnes (sign)

Caroline McInnes (print)

PROTHONOTARY OF THE
SUPREME COURT OF NOVA SCOTIA



SUPREME COURT OF NOVA SCOTIA

BETWEEN:

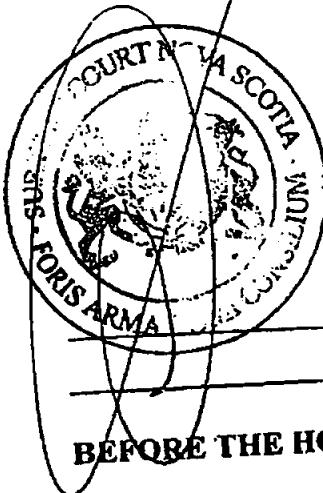
Trout Point Lodge Ltd., Charles Leary & Vaughn Perret

Plaintiff

- and -

Douglas K. Handshoe

Defendant

S.G.D.
K.C.
J.

ORDER

BEFORE THE HONOURABLE JUSTICE KEVIN COADY:

WHEREAS the Court is satisfied that the Defendant Douglas K. Handshoe was personally served with notice of this action;

AND WHEREAS the Defendant Douglas K. Handshoe filed a Demand for Notice and did not file a Defence to this action;

AND WHEREAS the Court is satisfied that the Defendant Douglas K. Handshoe received notice of this assessment of damages;

AND AFTER HAVING REVIEWED the Plaintiff's evidence, exhibits and submissions and being satisfied that the Defendant Douglas K. Handshoe infringed all three plaintiffs copyright in photographic images throughout 2012 and 2013.

IT IS ORDERED:

1. THAT the Defendant Douglas K. Handshoe pay the sum of twenty thousand Canadian dollars (\$20,000) in statutory damages to Charles Leary;
2. THAT the Defendant Douglas K. Handshoe pay the sum of forty thousand Canadian dollars (\$40,000) in statutory damages to Trout Point Lodge Ltd.;
3. THAT the Defendant Douglas K. Handshoe pay the sum of twenty thousand Canadian dollars (\$20,000) in statutory damages to Vaughn Perret;
4. THAT the Defendant Douglas K. Handshoe pay all the Plaintiffs the sum of one hundred thousand Canadian dollars (\$100,000) in punitive damages.

DATED at Halifax, Nova Scotia, this 26th day of February, 2014.

Handwritten signature of Gael O'Keefe.

Certified to be a true and correct copy
of original document herein

March 1, 2014

Handwritten signature of Gael O'Keefe.

GAEL O'KEEFE
Deputy Prothonotary

Exhibit "B"

IN THE CIRCUIT COURT OF HANCOCK COUNTY, MISSISSIPPI

VAUGHN PERRET)	
CHARLES LEARY)	PLAINTIFFS
TROUT POINT LODGE, LTD, A Nova)	
Limited Company)	
v.)	Civil Action No. _____
DOUGLAS HANDSHOE)	DEFENDANT

NOTICE OF FILING OF REMOVAL

Defendant hereby gives notice that he has filed a Notice of Removal in the United States District Court for the Southern District of Mississippi in the case styled Vaughn Perret, Charles Leary and Trout Point Lodge Limited, Civil Action No. 14-0197. A copy of the Notice of removal is attached as Exhibit "1".

Respectfully submitted this 11th day of June, 2014,



Defendant
Douglas Handshoe
214 Corinth Drive
Bay St Louis, MS 39520
(601) 928-5380
earning04@gmail.com

CERTIFICATE OF SERVICE

I, Douglas Handshoe, certify I have sent a true and correct copy of the foregoing Notice of Filing of Notice of Removal to the following via United States Mail:

M. Judith Barnett, Esq.
1911 Dunbarton Drive
Jackson, MS 39216
Telephone: (601) 981-4450
Facsimile: (601) 981-4717
mjbarnettppa@yahoo.com
Attorney for Plaintiffs

Respectfully submitted this 11th day of June, 2014,



Defendant
Douglas Handshoe
214 Corinth Drive
Bay St Louis, MS 39520
(601) 928-5380
earning04@gmail.com